

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND DIVISION**

YADIRA URANGA,

Plaintiff,

V.

**MIDLAND ODESSA URBAN
TRANSIT DISTRICT, CITY OF
ODESSA, TEXAS, CITY OF
MIDLAND, TEXAS, RATP DEV
USA, INC., and MIDLAND-
ODESSA TRANSIT
MANAGEMENT, INC.,**

Defendants.

CIVIL ACTION NO. 7:20-CV-21

JURY DEMANDED

**JOINT AGREED MOTION TO EXTEND EXPERT, DISCOVERY
AND DISPOSITIVE MOTIONS DEADLINES**

TO THE HONORABLE JUDGE JAMES WESLEY HENDRIX:

Plaintiff, YADIRA URANGA and Defendants MIDLAND ODESSA URBAN TRANSIT DISTRICT, CITY OF ODESSA, TEXAS, CITY OF MIDLAND, TEXAS, RATP DEV USA, INC., and MIDLAND-ODESSA TRANSIT MANAGEMENT, INC. (collectively the “Parties”) hereby request that the Court grant an extension of time for the Defendants’ expert deadline, the discovery deadline and the dispositive motions deadline currently set for October 28, 2020, November 4, 2020 and December 4, 2020.

1. The Court entered its amended scheduling order on August 5, 2020 (Dkt. 28) which set the Defendants' expert deadline on October 28, 2020, the discovery deadline on November 4, 2020 and the dispositive motions deadline on December 4, 2020. This case is currently set for a jury trial on August 2, 2021.

2. The Parties have been engaged in written discovery and depositions. However, due to scheduling issues related to the number of parties involved in this case and other settings, additional depositions need to be conducted prior to trial. Specifically, Plaintiff's deposition has not yet been taken and needs to be taken prior to the close of discovery. Plaintiff also needs to take Defendants' expert deposition and Defendants need to take Plaintiff's expert deposition. The Parties request the discovery deadline be extended to December 31, 2020 so that discovery may be completed.
3. Defendants' expert needs an additional two weeks to finalize his report due to scheduling issues in other cases and the niche nature of the legal issues in this dispute. The Parties request the Court to extend the Defendants' expert deadline to November 11, 2020.
4. The Parties also request an extension of the dispositive motions deadline to permit motions to be filed once discovery is closed. The Parties request the Court to extend the dispositive motions deadline to February 1, 2021.
5. Counsel for the Parties have conferred and agreed to the extensions requested in this Motion. The Parties' request does not impact the current pretrial deadlines or the date this case is set for trial.

ACCORDINGLY, the Parties request that the Court grant the extensions requested herein, extend the Defendants' expert deadline to November 11, 2020, the discovery deadline to December 31, 2020, extend the dispositive motions deadline to February 1, 2021, and for such other relief to which the Parties may show themselves justly entitled.

Respectfully submitted,

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CERTIFICATE OF SERVICE

This is to certify that on the 14th day of October, 2020, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notice of such filing to all attorneys of record on file.

/s/ Amanda N. Crouch

Amanda N. Crouch